

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of the Arbitration	:	Docket No.
Between:	:	08-cv-7338 (JSR)
	:	
GLOBAL INTERNATIONAL REINSURANCE	:	
COMPANY, LTD.,	:	
	:	
Petitioner,	:	
	:	
-against-	:	
	:	
TIG INSURANCE COMPANY,	:	
	:	
Respondent.	:	
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**MOTION OF PETITIONER GLOBAL INTERNATIONAL REINSURANCE  
COMPANY, LTD. TO FILE CERTAIN DOCUMENTS UNDER SEAL**

Petitioner GLOBAL International Reinsurance Company, Ltd., formerly known as Gerling Global International Reinsurance Company, Ltd. ("Global"), respectfully moves this Court for an Order granting Global leave to file the following papers under seal until such time as respondent TIG Insurance Company is required to show cause why such papers should remain under seal:

(i) Global's Petition to Vacate Arbitration Award; (ii) Global's Memorandum of Law in Support of Petition to Vacate Arbitration Award; (iii) the Declaration of Christopher P. Anton in Support of Global's Petition to Vacate Arbitration Award and all Exhibits thereto; (iv) Global's Memorandum of Law in Support of Motion to File Certain Documents under Seal; and (v) the Declaration of Christopher P. Anton in Support of Global's

Motion to File Certain Documents under Seal.

In support of its Motion, Global relies on the Declaration of Christopher P. Anton in support of the Motion and Global's Memorandum of Law in support of the Motion.

A proposed form of Order is submitted herewith.

Dated: Short Hills, New Jersey  
August 18, 2008

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Ltd.

BY: /s/ Christopher Paul Anton  
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